Subject: Re: Public Records Request — Automated License Plate Reader (ALPR) Program
Date: Wednesday, August 5, 2026 at 2:59:41 PM Eastern Daylight Time
From: Mark Williams
To: legalaffairs@ecsu.edu
CC: chancellor@ecsu.edu
Attachments: image001.jpg, image002.jpg

Dear Ms. Rudisill:

I write to escalate an ALPR / Flock public-records request that Elizabeth City State University has now left unanswered for more than five weeks. I filed it on June 28, 2026, and followed up thereafter. To date the University has produced no records, provided no completion date, and cited no exemption. I have copied Chancellor Hargrove and the UNC System's General Counsel because the request has gone unanswered at the office level.

The governing law is not in dispute. N.C. Gen. Stat. § 132-6(a) requires public records to be furnished "as promptly as possible," and North Carolina's liberal-access standard does not permit a backlog or a first-come-first-served practice to justify open-ended delay (*State Emps. Ass'n v. Dep't of State Treasurer*, 2010). The University need not create records, but it must produce those it has (*Ochsner*, 2019); vendor-held audit data remains reachable where the institution's contract gives it a right to that data (*Gray Media Grp. v. City of Charlotte*, 2023); and § 132-1.4 does not convert a vendor contract or an administrative audit into a non-public record (*Gannett v. SBI*, 2004).

The comparison is stark, and it is why I've escalated. **Seven constituent institutions of the UNC System received this identical request and have already produced records or begun rolling production** — UNC School of the Arts in three days, NC A&T in eleven. The core items are Flock reports generated on demand from the Insights tab; they are not a research project. ECSU stands out for having produced nothing at all.

Accordingly, I ask that by **Friday, August 14, 2026** the University either (a) produce the responsive records, beginning with the Flock Network Audit in native CSV, and the vendor contract; or (b) provide an itemized, statute-by-statute basis for anything withheld. Absent one of the two, I will treat the request as constructively denied and evaluate the remedy the Public Records Act provides under N.C. Gen. Stat. § 132-9 — an action to compel production and to recover costs and reasonable attorneys' fees under § 132-9(c).

Before any filing, I remain willing to resolve this consensually, including through pre-litigation mediation under N.C. Gen. Stat. § 7A-38.3E, and I am glad to clarify or reasonably narrow any item. But the current silence cannot continue.

Respectfully,
Mark Spencer Williams

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From: Mark Williams <mwilliams@ricefamilylaw.com>
Date: Monday, July 13, 2026 at 3:41 PM
To: legalaffairs@ecsu.edu <legalaffairs@ecsu.edu>
Subject: Re: Public Records Request — Automated License Plate Reader (ALPR) Program

I am following up on the public records request I submitted on **June 28, 2026** regarding your institution's automated license plate reader (Flock/ALPR) records. As of today, I have not received the records or a response.

North Carolina's Public Records Law requires public records to be produced "as promptly as possible" (N.C. Gen. Stat. § 132-6(a)). More than two weeks have now passed. Please advise the current status of the request and the date by which I can expect production. If any portion is being withheld or redacted, please identify the specific statutory basis for each.

If it would speed production, I am glad to clarify or narrow the request. Thank you for your attention to this matter.

Sincerely,
Mark Spencer Williams

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From: Mark Williams <mwilliams@ricefamilylaw.com>
Date: Monday, June 29, 2026 at 12:14 AM
To: legalaffairs@ecsu.edu <legalaffairs@ecsu.edu>
Subject: Public Records Request — Automated License Plate Reader (ALPR) Program

To the Public Records Officer / Office of General Counsel:

Pursuant to the North Carolina Public Records Law (N.C. Gen. Stat. § 132-1 et seq.), I request copies of the following records concerning your institution's use of automated license-plate-reader (ALPR) cameras, including any provided by Flock Safety, Genetec, Motorola, or any other vendor, whether operated by your campus police or accessible to them through another agency's network:

1. All current contracts, quotes, purchase orders, and renewals with any ALPR vendor.
2. Any policy, directive, or standard operating procedure governing ALPR use, access, data retention, and auditing.
3. The number of ALPR cameras operated by or accessible to your institution (fixed and mobile), and the locations or areas they cover.
4. The retention period for captured plate data, and the schedule on which it is deleted.
5. Any memoranda of understanding or data-sharing agreements with other agencies — local, state, or federal (e.g., the municipal police department, the county sheriff, the N.C. SBI, ICE, CBP, other UNC System institutions) — and any participation in a statewide or nationwide lookup network.
6. If your institution operates or accesses a Flock Safety network, the following reports generated from the Flock "Insights" tab, for the most

recent three complete calendar months (March 1, 2026 through May 31, 2026), in native CSV or Excel format: (a) the Organization Audit — searches performed within your institution's own Flock organization; (b) the Network Audit — searches of your institution's Flock network by any agency in the Flock system; and (c) the Event Log. Each of these reports is generated on demand within the Flock platform and is not burdensome to produce.

7. Your institution's Flock network/sharing configuration — the organization sharing settings showing State Network, Nationwide Network, and Community Network participation, and any custom sharing arrangements (an export or screenshots of the sharing/organization settings will suffice).
8. The names of agencies and organizations with which your institution shares ALPR data; from which it receives ALPR data; with which it shares "hot list" information; and from which it receives "hot list" information.
9. Any records of misuse, policy violations, or disciplinary action related to ALPR use.

Please provide records electronically where available. If any portion is withheld, please cite the specific statutory exemption and produce all reasonably segregable non-exempt portions, and advise of any fees before incurring them. Thank you for your assistance.

Thank you,

~Mark

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